

AEGIS LAW FIRM, PC

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Attorneys for Plaintiff Diana Foy and Raymond Ybarra, individually,
and on behalf of all others similarly situated.

[Additional Counsel on Following Page].

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF KERN

DIANA FOY, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

EXEL, INC. DBA DHL SUPPLY CHAIN;
and DOES 1 through 20, inclusive,

Defendants.

Case No. BCV-20-102463

*Assigned for All Purposes to:
Hon. Bernard C. Barmann, Jr.
Dept. 10*

**DECLARATION OF CHELSEA D. HOLLINS
IN SUPPORT OF MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT REPRESENTATIVE
ACTION SETTLEMENT**

HAINES LAW GROUP, APC

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Attorneys for Plaintiff Raymond Harris, individually,
and on behalf of all others similarly situated.

1 I, Chelsea D. Hollins, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before all courts of the State of
3 California. I am an associate attorney at Aegis Law Firm, counsel of record for plaintiffs Diana
4 Foy and Raymond Ybarra. The following facts are within my personal knowledge and if called as
5 a witness, I could and would competently testify thereto.

6 2. I submit this Declaration in support of Plaintiffs' Motion for Approval of Private
7 Attorneys General Act Representative Action Settlement.

8 **Counsel's Qualifications**

9 3. Aegis Law Firm prosecutes wage and hour cases, including class actions on
10 behalf of employees and others who have had their rights violated. Aegis, either on its own or
11 with co-counsel is currently serving as plaintiffs' counsel of record in dozens of wage and
12 hour and employment class action cases pending in both state and federal court.

13 4. The attorneys working on this case have been appointed class counsel in many
14 cases, through both contested motions and settlement approval motions.

15 5. Aegis has litigated and successfully resolved many wage and hour class action
16 cases involving failure to pay wages and derivative Labor Code claims and penalties. *See, e.g.,*
17 *Bonello v. Laboratory Express, Inc.*, San Bernardino Superior Court, Case No. CIVDS1714584
18 (class certification granted on May 14, 2021 for all current and former couriers misclassified as
19 independent contractors on issues of inaccurate wage statements, failure to reimburse business
20 expenses, and unfair competition); *Roman, et al. v. TRM Manufacturing, Inc.*, Riverside Superior
21 Court, Case No. RIC1706458 (class certification granted on December 17, 2020 for all current
22 and former non-exempt workers' on issues of rounding, meal period, and rest period claims);
23 *Gamboa v. Kamran, et al.*, San Bernardino Superior Court, Case No. CIVDS1605273 (class
24 certification granted on September 16, 2019, for factory workers on issues of rounding, automatic
25 deduction of first meal period, and second meal period); *Romo, et. al, v. GMRI, Inc. d/b/a/ Olive*
26 *Garden*, United States District Court Central District of California, Case No. EDCV-12-0715-
27 JLQ (class certification granted for restaurant workers' rest period claims); *Sawyer v. Retail*
28 *Data, LLC*, Orange County Superior Court, Case No. 30-2014-00753767-CU-OE-CXC (unpaid

1 wage and rest break claims for piece rate workers); *Gonzalez v. SFFI Company, Inc., et. al*, San
2 Bernardino County Superior Court, Case No. CIV DS1504287 (unpaid wages, meal period and
3 rest break claims for non-exempt employees); *Antoine v. Riverstone Residential California,*
4 *Inc., et. al*, Sacramento County Superior Court, Case No. 34-2013-00155974 (rate of pay, on-
5 call time, unpaid wage, meal period, rest break, and expense reimbursement claims for non-
6 exempt employees); *Nguyen v. Pharmerica*, Orange County Superior Court, Case No. 30-2014-
7 00716072-CU-OE-CXC (unpaid wages and unreimbursed expenses for pharmacists); *Orellana*
8 *v. Westlake*, Los Angeles County Superior Court, Case No. BC539614 (unpaid overtime, meal
9 period and rest break claims for call center employees); *Kent v. Mountain View Child Care,*
10 *Inc.*, Los Angeles County Superior Court, Case No. BC539633 (minimum wage, overtime, meal
11 period, and rest break claims for hospital workers); *Durroh v. East West Bank*, Los Angeles
12 County Superior Court, Case No. BC528860 (overtime claims for failure to include bonuses in
13 regular rate of pay for bank workers); *O'Brien et al. v. Pizza Hut of Southeast Kansas, Inc. et*
14 *al.*, Riverside County Superior Court, Case No MCC 1301030 (meal period and expense
15 reimbursement claims for delivery drivers); *Bell v. Prime Healthcare*, Orange County Superior
16 Court, Case No. 30-2011-00475240-CU-OE-CXC (overtime claims for failure to include shift
17 premiums in regular rate of pay and failure to provide meal and rest periods to hospital
18 workers), *Grana v. Toys R US-Delaware, Inc.*, Central District of California, Case No. 2:13-cv-
19 01302-DSF-JCG (bag check claims for unpaid wages and failure to provide meal periods and
20 rest breaks to retail employees); *Mendez v. H.J. Heinz Company, L.P., et. al*, Orange County
21 Superior Court, Case No. 30-2013-00644915-CU-OE-CXC (failure to pay all wages to factory
22 workers due to rounding practice); *Fresh & Easy Wage and Hour Cases*, Los Angeles Superior
23 Court, Cas No. JCCP 4705 (failure to provide meal and rest periods to supermarket workers);
24 *Lunsford v Stater Bros.*, Riverside Superior Court, Case No. RIC 1104475 (failure to provide
25 meal and rest periods to supermarket workers); *Gregg v. Belo*, Riverside Superior Court, Case
26 No. RIC 523697 (unpaid wages and missed meal and rest periods due to misclassification of
27 newspaper delivery employees); *Brown v. Experian Information Solutions, Inc., et. al.*, Orange
28 County Superior Court, Case No. 30-2012-00375163 (misclassification of engineers and similar

positions); *Tereth v. Shakey's USA, Inc.*, Los Angeles Superior Court, Case No. BC441359 (failure to provide meal and rest periods to restaurant employees); *Azurin v. Harbor Distributing LLC, et. al.*, Los Angeles Superior Court, Case No. BC421392 (failure to pay overtime wages, provide meal and rest periods, reimburse business expenses to Account Managers); *Caffero v. ABC* (failure to provide meal periods and reimburse expenses of therapists).

6. Kashif Haque received his J.D. in 2001 from Washington University School of Law. While in law school, Mr. Haque was a member of the Law Review Editorial Board, author of an article published in the Law Review, Executive Board Member of Moot Court, and a member of the Dean's List. He received a Bachelor's of Science in Business Administration from the University of Central Missouri in 1998, where he was a member of the Beta Alpha Psi honors fraternity.

7. Since 2004, Mr. Haque has exclusively focused his practice on plaintiff's employment litigation with a specific focus on wage and hour claims. Since then, he has represented over 500,000 employees with their employment claims, many of which included wage and hour claims. He has been appointed class counsel in approximately 100 cases and is currently litigating over 150 employment wage and hour class action cases.

8. Mr. Haque authored a book on employment litigation strategies with West Publishing and has been invited to speak on class action and wage and hour issues on numerous occasions. He has spoken at seminars by the State Bar of California, California Employment Lawyer's Association (CELA), Orange County Bar Association, and various other CLE providers. Mr. Haque is the former Chair for the Labor and Employment Section of the Orange County Bar Association. He was selected as one of the Top 50 Attorneys in Orange County by Super Lawyers for 2017 and 2019. He has been a Super Lawyer for every year from 2009 to the present. OC Register/Metro has selected him as one of the Top 5 Employment Lawyers in Orange County for every year the list was published, from 2012 to 2021. Mr. Haque currently bills at a rate of \$785.00 an hour.

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1 9. Samuel A. Wong is a graduate of University of Pennsylvania Law School, where
2 he received his J.D. in 2001. Mr. Wong received a Bachelors of Arts in Sociology from the
3 University of California at Berkeley in 1997.

4 10. After graduation from law school in 2001, the same year in which Mr. Wong
5 took and successfully passed the California Bar Exam, Mr. Wong moved to back to Los
6 Angeles, California where he was employed at Paul Hastings, Janofsky & Walker, LLP. While
7 working in the employment department at Paul Hastings, he was involved in numerous wage
8 and hour class action lawsuits and other employment related matters.

9 11. Mr. Wong became a founding partner of Aegis Law Firm, PC in 2003, and
10 focused his practice on plaintiff's side employment work. Throughout his years of practice, Mr.
11 Wong represented and obtained successful outcomes for his clients, including awards through
12 arbitration and trial.

13 12. Mr. Wong is a member of the Orange County Bar Association, Orange County
14 Trial Lawyers Association, and California Employment Lawyers Association.

15 13. Mr. Wong was chosen by Law and Politics Magazine as a Super Lawyer Rising
16 Star, representing one of the top 2.5% of lawyers under 40 in Southern California in 2011,
17 2012, 2013, and 2014. He was chosen by Law and Politics Magazine as a Super Lawyer in
18 2015, 2016, 2017, and 2018. Mr. Wong was also chosen as a Top Attorney in the field of
19 employment law by OC Metro in 2014, 2015, and 2018.

20 14. Jessica L. Campbell is a partner at Aegis Law Firm. She was admitted to the
21 California Bar in December of 2011, and received her J.D. from Santa Clara University School
22 of Law and her B.A. from the University of California, Berkeley. Ms. Campbell has dedicated
23 her career to plaintiffs'-side class action. Her experience includes successful work on class
24 action appeals, class certification motions, and class settlements. Ms. Campbell was chosen by
25 Law and Politics Magazine as a Super Lawyer Rising Star, representing one of the top 2.5% of
26 lawyers under 40 in Southern California in 2018, 2019, 2020, and 2021. Ms. Campbell
27 currently bills at a rate of \$650.00 an hour.

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15. I am an associate at Aegis Law Firm. I was admitted to the California Bar in December of 2015. I received my J.D. from Western Statue University School of Law. I received my B.S. from the University of California, Riverside. Prior to joining Aegis Law Firm, I worked at insurance defense firms where I focused primarily on defense-side litigation including wage and labor matters. I currently bill at a rate of \$450.00 an hour.

Class Counsel's Costs

16. In litigating this case, my office spent \$8,114.53 in litigation costs, such as filing fees, copies, and postage.

Exhibits

17. Attached hereto as **Exhibit 1** is a true and correct copy of my firm's cost journal for actual costs expended on this case.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 4, 2022, in Irvine, California.

Ch. 1

Chelsea D. Hollins

EXHIBIT 1

Matter Billing Detail

Report Date: 1/19/2022
 Report Time: 1:57PM
 Page: 1 of 3
 User ID: Carlsen

Aegis Law Firm, PC

Date Range: 01/01/1900 to 01/19/2022

Client: 547401 - Diana Foy

Matter: 1662 - Foy v. Exel, Inc. dba DHL Supply Chain (PAGA)

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
10/20/2020	RES	Database Research Fee- Chacon - MPA	\$7.50		Unbilled				
10/20/2020	FF	Filing Fee- LWDA filing	\$75.00		Unbilled				
10/21/2020	FF	Filing Fee- SC	\$1,435.00		Unbilled				
10/21/2020	AFF	Administrative Filing Fee- S&C	\$64.15		Unbilled				
10/26/2020	SOP	Service of Process- S&C	\$90.93		Unbilled				
11/04/2020	AFF	Administrative Filing Fee- POS	\$27.00		Unbilled				
11/10/2020	RES	Database Research Fee- Complaint [Hookerv. Excel]	\$19.00		Unbilled				
12/29/2020	AFF	Administrative Filing Fee- FAC	\$6.75		Unbilled				
01/07/2021	AFF	Administrative Filing Fee- Ntc of Ruling	\$10.35		Unbilled				
01/21/2021	AFF	Administrative Filing Fee- Proposed Order Granting Dismissal	\$6.75		Unbilled				
01/21/2021	FF	Filing Fee- Proposed Order Granting Dismissal	\$20.00		Unbilled				
01/21/2021	AFF	Administrative Filing Fee- Request for Dismissal	\$11.30		Unbilled				
04/05/2021	AFF	Administrative Filing Fee - CMS	\$10.50		Unbilled				
04/19/2021	AFF	Administratice Filing Fee - Amended Complaint	\$6.75		Unbilled				
04/19/2021	FF	Filing Fee - Stip to Allow Filing of SAC	\$20.00		Unbilled				
04/19/2021	AFF	Administrative Filing Fee - Stip to Allow Filing of SAC	\$11.30		Unbilled				
04/19/2021	AFF	Administrative Filing Fee - Amended POS	\$10.50		Unbilled				
05/07/2021	RES	Vendor: Department of Industrial Relations; Date: 5/7/2021 - Database Research Fee-Public Records Request	\$13.30		Unbilled			995651	Department of Industrial Relatio
05/28/2021	MED	Vendor: Steven Pearl; Date: 5/28/2021 - Mediation Services-	\$3,000.00		Unbilled			995676	Steven Pearl
05/28/2021	AFF	Administrative Filing Fee - Stip. and Order for Leave to File SAC [Rejected]	\$6.75		Unbilled				
06/01/2021	AFF	Administrative Filing Fee - SAC	\$10.50		Unbilled				

Matter Billing Detail

Report Date: 1/19/2022
Report Time: 1:57PM
Page: 2 of 3
User ID: Carlsen

Aegis Law Firm, PC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
06/22/2021	AFF	Administrative Filing Fee - Ntc of Case Reassignment	\$10.50		Unbilled				
07/06/2021	EX	Vendor: Berger Consulting Group, LLC; Date: 7/6/2021 - Expert Fees-	\$1,875.00		Unbilled			995701	Berger Consulting Group, LLC
07/12/2021	AFF	Administrative Filing Fee - CMS [Rejected]	\$6.75		Unbilled				
07/12/2021	FF	Filing Fee - Stip & Order	\$20.00		Unbilled				
07/12/2021	AFF	Administrative Filing Fee - Stip & Order	\$11.30		Unbilled				
07/12/2021	AFF	Administrative Filing Fee - CMS	\$10.50		Unbilled				
09/14/2021	FF	Filing Fee - Stip and Order	\$31.30		Unbilled				
10/21/2021	FF	Stip & Ord for Leave to File TAC	\$31.30		Unbilled				
11/11/2021	FF	Stip & Ord	\$31.30		Unbilled				
11/19/2021	FF	Amended Complaint	\$10.50		Unbilled				
01/19/2022	CC	Cumulative Copies, Faxes, Scans, Telephone Charges, Postage	\$1,212.75		Unbilled				
Total:			\$8,114.53	\$0.00					
Balance:			\$8,114.53						

Matter Billing Detail

Aegis Law Firm, PC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Total Fees Billed- - - - -			\$0.00						
Total Fees Unbilled : - - - - -			\$0.00						
Total Fees Received : - - - - -			\$0.00						
Total Soft Cost Billed : - - - - -			\$0.00						
Total Soft Cost Unbilled : - - - - -			\$0.00						
Total Soft Cost Received : - - - - -			\$0.00						
Total Hard Cost Billed : - - - - -			\$0.00						
Total Hard Cost Unbilled : - - - - -			\$8,114.53						
Total Hard Cost Received : - - - - -			\$0.00						
Total Taxes Billed : - - - - -			\$0.00						
Total Taxes Unbilled : - - - - -			\$0.00						
Total Taxes Received : - - - - -			\$0.00						
Total Late Charges Billed : - - - - -			\$0.00						
Total Late Charges Unbilled: - - - - -			\$0.00						
Total Late Charges Received : - - - - -			\$0.00						
Trust Balance: - - - - -			\$0.00						